



Jamie M. (Mike) Tan
Director
Federal Regulatory

AT&T Services, Inc.
1120 20th St. NW, Suite 1000
Washington, D.C. 20036
Phone 202 457-3035
Fax 202 457-2062
E-Mail: jamie.tan@att.com

July 23, 2010

VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street SW
Washington DC 20554

Re: NOTICE OF EX-PARTE COMMUNICATION

*In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45;
In the Matter of Lifeline and Link-Up, WC Docket No. 03-109.*

Dear Ms. Dortch:

Yesterday, in response to an e-mail request from Lauren Kravetz of the Commission's Consumer and Governmental Affairs Bureau, Beth Fujimoto (of AT&T) provided a copy of presentation materials used by Ms. Fujimoto during a Lifeline event earlier this week. I am attaching the presentation such that it can be included in the record in the above referenced proceedings.

Pursuant to section 1.1206(b) of the Commission's rules, this letter and the attached are being filed in the above referenced dockets via the FCC's Electronic Comment Filing System. Should you have any questions regarding the above or the attached, please feel free to contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read "J. M. Tan".

Attachment

Cc (via e-mail): Ms. Lauren Kravetz, Federal Communications Commission



AT&T's Lifeline Modernization Plan

Beth Fujimoto

Executive Director, Public Policy

July 20, 2010

Lifeline must be overhauled before it can be expanded to support broadband

National Broadband Plan: Lifeline observations, recommendations issues referred to Joint Board (FCC 10-72, 5/5/2010)

Outreach, eligibility requirements may be disincentives for provider participation, affecting consumer Lifeline participation

State social service agencies should be more active in outreach and eligibility

Consider centralized database for online certification/verification as cost effective way to minimize waste, fraud and abuse





AT&T's Lifeline Modernization Plan


Comprehensive set of common-sense ways
Lifeline and Link-Up programs should be
modernized, consistent with National
Broadband Plan recommendations

1. Streamline consumer outreach and eligibility processes

Issues today

- Private sector companies-
- publicize Lifeline
- receive consumers' private income information
- make government assistance eligibility decisions
- Compendium of federal and state rules
- Inconsistent interpretations
- No unified consumer benefits enrollment
- Disincentives for provider participation


Solutions



State agencies assume responsibility for Lifeline outreach and eligibility, like any other public assistance program

- Streamlines outreach and enrollment for consumers, improving awareness and service delivery

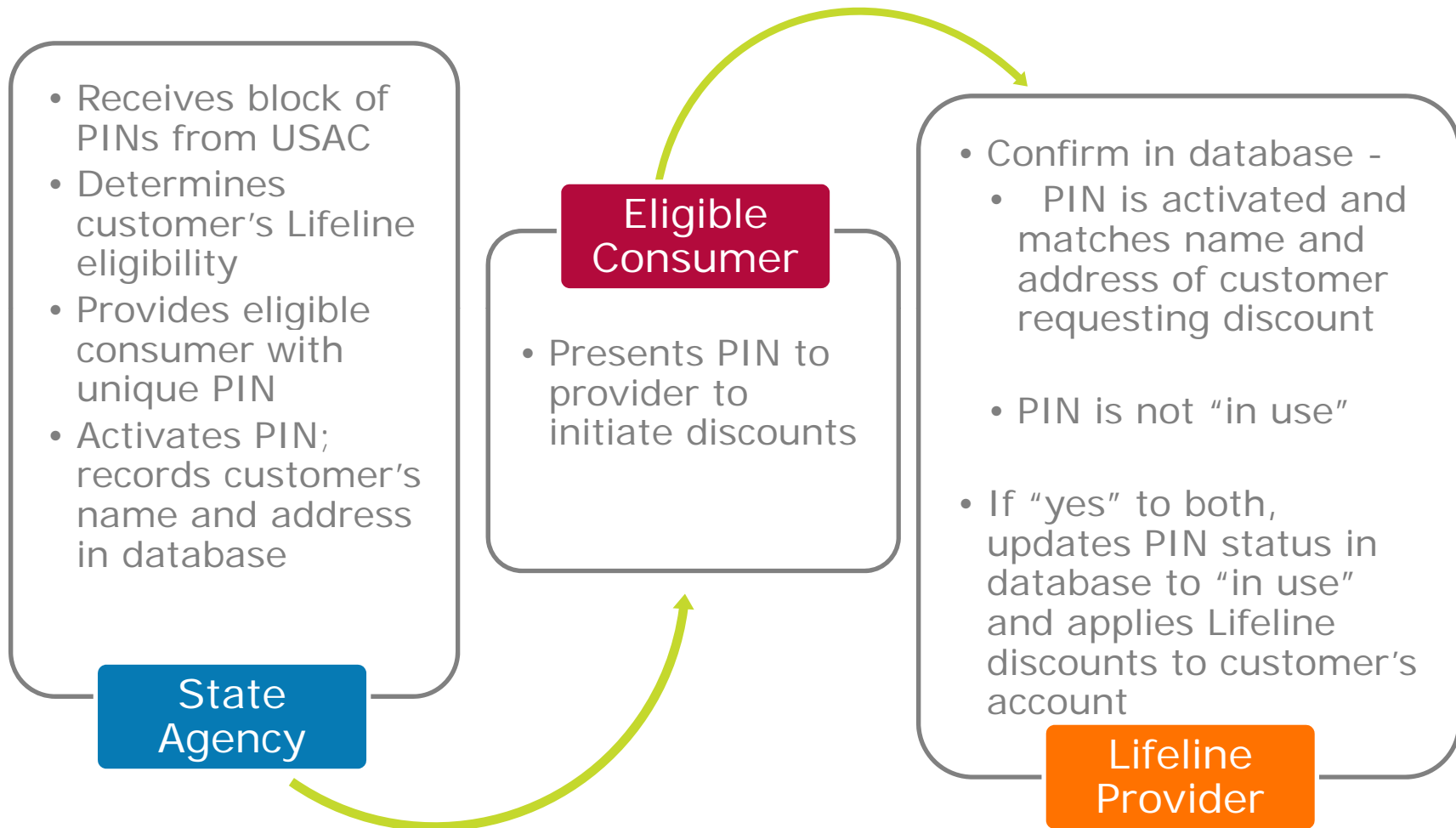
- Eliminates inappropriate private sector role



Consistent national eligibility rules facilitate national outreach



2. FCC should establish secure national PIN database at USAC to administer Lifeline



PIN-based database guards against waste, fraud and abuse

Eliminates
provider
discretion,
interpretations

PIN system
much easier to
audit

Reimbursement
directly derived
from
"in use" PINs

Once PIN "in
use" cannot be
used again

Dates
reimbursements
begin/end
certain

Eliminates
duplicative
discounts



More benefits of PIN-based national database

Single national database/process maximizes efficiency, cost-effectiveness

USAC database ensures cost equitably shared by all

Streamlines reimbursements – no line counts

Could be used to further streamline state Lifeline discounts

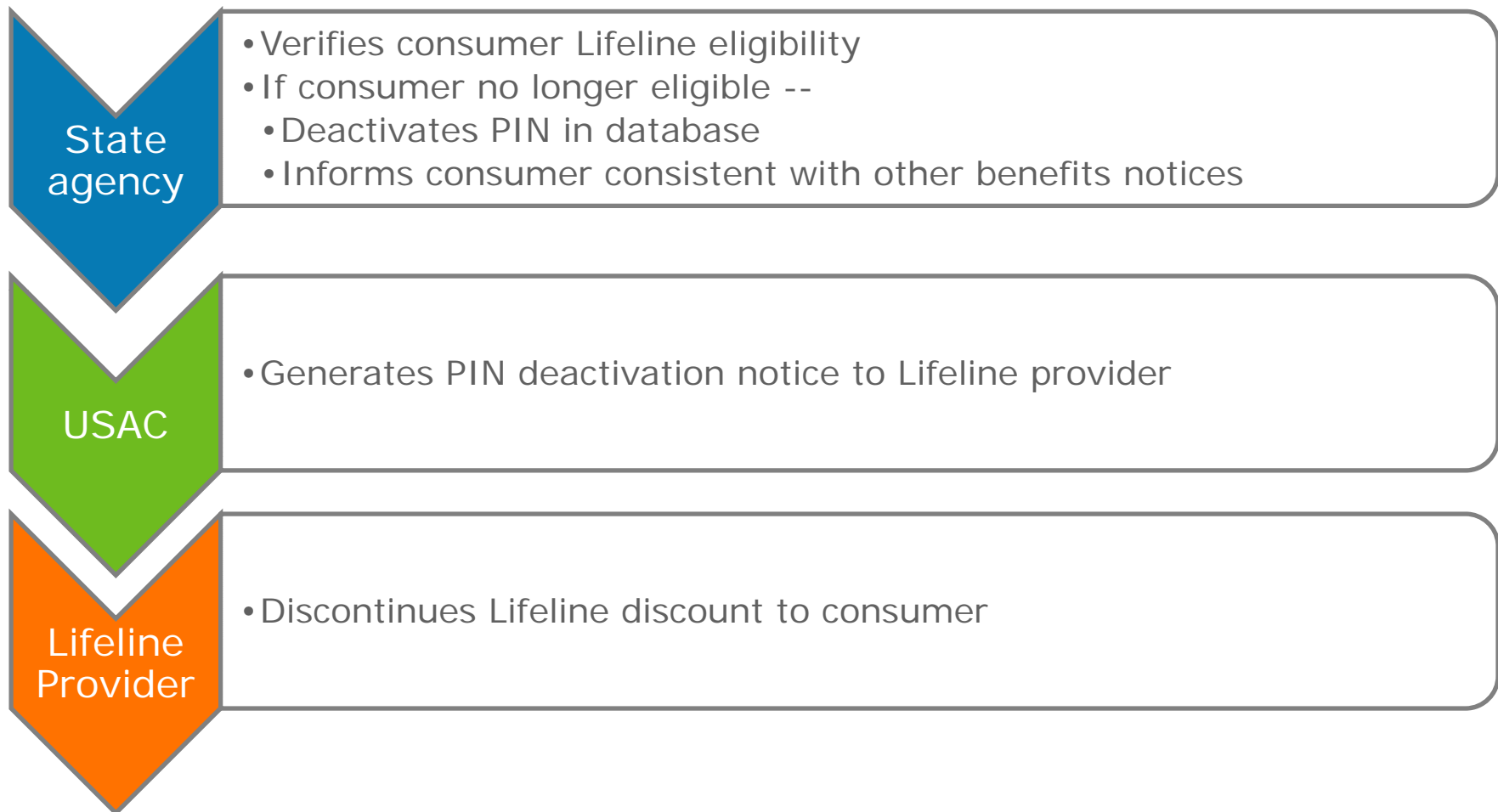
Quicker, easier for providers to determine which customers eligible

Better safeguards consumers' private information

Encourages provider participation, and ultimately consumer choice



3. States should perform any verification of consumers' continued eligibility



4. FCC should establish “Lifeline Provider” (LP) designation

- Separate from existing ETC designation
- Not subject to existing high-cost ETC requirements
- Not subject to § 214 of the federal Act



These common-sense first steps will significantly improve the Lifeline program to help it meet its full potential

